

1 JOHN D. GIFFIN, CASB No. 89608
 john.giffin@kyl.com
 2 JOSEPH A. WALSH II, CASB No. 143694
 joe.walsh@kyl.com
 3 JULIE L. TAYLOR, CASB No. 154341
 julie.taylor@kyl.com
 4 ANNE M. MORIARTY, CASB No. 251803
 annie.moriarty@kyl.com
 5 KEESAL, YOUNG & LOGAN
 A Professional Corporation
 6 450 Pacific Avenue
 San Francisco, California 94133
 7 Telephone: (415) 398-6000
 8 Facsimile: (415) 981-0136

9 Attorneys for Defendants
 REGAL STONE, LIMITED, FLEET MANAGEMENT, LTD.,
 10 and M/V COSCO BUSAN

11 **UNITED STATES DISTRICT COURT**
 12 **NORTHERN DISTRICT OF CALIFORNIA**
 13

14 CHELSEA, LLC, MARK RUSSO, and
 15 ALLEN LORETZ, individually and on
 behalf of all others similarly situated,

16 Plaintiff,

17 vs.

18 REGAL STONE, LTD., HANJIN
 SHIPPING CO., LTD., SYNERGY
 19 MARITIME, LTD, FLEET
 MANAGEMENT, LTD, and JOHN COTA,
 20 *In Personam*; M/V COSCO BUSAN, their
 engines, tackle, equipment,
 21 appurtenances, freights, and cargo *In Rem*,

22 Defendant.
 23

) Case No. C-07-5800-SC

) AT LAW AND IN ADMIRALTY

) **STIPULATION OF PLAINTIFFS AND**
) **DEFENDANTS REGAL STONE**
) **LIMITED, FLEET MANAGEMENT**
) **LTD., AND M/V COSCO BUSAN TO**
) **EXTEND THE TIME FOR FILING**
) **AND SERVICE OF A RESPONSE TO**
) **PLAINTIFFS' VERIFIED SECOND**
) **AMENDED CLASS ACTION**
) **COMPLAINT AND PROPOSED**
) **ORDER**

TO THE COURT AND ALL COUNSEL OF RECORD:

IT IS HEREBY STIPULATED by and between Plaintiffs CHELSEA, LLC, MARK RUSSO, and ALLEN LORETZ ("Plaintiffs") and Defendants REGAL STONE LIMITED, FLEET MANAGEMENT, LTD., and M/V COSCO BUSAN *in rem* ("Defendants"), through their respective counsel of record, that the time for Defendants to file and serve a response to Plaintiffs' Verified Second Amended Class Action Complaint is further extended by fourteen (14) days. Defendants will file and serve their responses to Plaintiffs' Verified Second Amended Class Action Complaint no later than Friday, September 19, 2008.

This stipulation is not entered into for purposes of delay, but to permit Defendants to continue their investigation, to address the new allegations contained in Plaintiff's Verified Second Amended Class Action Complaint, and to allow Defendants to formulate a proper response.

IT IS SO STIPULATED AND AGREED.

DATED: September 5, 2008

AUDET & PARTNERS, LLP

By: /s/ William M. Audet
WILLIAM M. AUDET
Attorney for Plaintiffs
CHELSEA, LLC, MARK RUSSO
and ALLEN LORETZ

DATED: September 5, 2008

KEESAL, YOUNG & LOGAN

By: /s/ Julie L. Taylor
JOHN D. GIFFIN
JOSEPH A. WALSH II
JULIE L. TAYLOR
ANNE M. MORIARTY

Attorneys for Defendants
REGAL STONE LIMITED, FLEET
MANAGEMENT LTD., and M/V
COSCO BUSAN

ORDER

Based on the foregoing Stipulation, IT IS HEREBY ORDERED that the time for Defendants REGAL STONE LIMITED, FLEET MANAGEMENT, LTD., and M/V COSCO BUSAN *in rem* ("Defendants") to file and serve a response to the Verified Second Amended Class Action Complaint of Plaintiffs CHELSEA, LLC, MARK RUSSO, and ALLEN LORETZ is extended by fourteen (14) days. Defendants are ordered to file and serve their responses to Plaintiffs' Verified Second Amended Class Action Complaint no later than Friday, September 19, 2008.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: _____

HON. SAMUEL CONTI
UNITED STATES DISTRICT JUDGE